

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

Come Now Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC- Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors-in-interest to Black Duck Properties, LLC (collectively the “Debtors”), and file this Agreed Motion to Continue DMA Properties, Inc.’s (“DMA”) Motion for Attorney’s Fees and Motion to Amend Judgment and in support would respectfully show as follows:

1. On March 24, 2021, the Court rendered its judgment and opinion in this matter, awarding DMA Properties Attorney’s Fees in connection with declaratory judgment. On April 7, 2021 DMA filed its’ Application for Attorney’s Fees and Motion to Amend Judgment, docket #240. On April 21, 2021 debtors filed the response and requested a hearing, docket #250. This Court set a hearing on the motions for June 17, 2021.

2. Since that time, debtor’s counsel was set for a time-sensitive hearing on an application for injunction on the same date in Lamar County.

3. Upon learning of the conflict Debtor’s Counsel immediately sought to confer with DMA’s Counsel. Upon such conference DMA’s and Longbranch’s Attorneys agreed to continue the hearing to the soonest available date. Parties respectfully request that the court continue this hearing for July 7, 2021, or the soonest available date.

WHEREFORE, PREMISES CONSIDERED, Debtors request that this Court enter an order resetting the hearing for DMA Properties, Inc.’s DMA Properties, Inc.’s Motion for Attorney’s Fees and Motion to Amend Judgment to July 7, 2021.

Signature on Following Page

Respectfully submitted,

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ATTORNEYS FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that I conferenced with counsel for DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP by email, and upon such conference they indicated that they are agreed to the relief sought in this motion.

/s/ John Muller

John Muller

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 28th day of May 2021:

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